Message

From: Buxbaum, David [Buxbaum.David@epa.gov]

Sent: 10/4/2021 9:05:40 PM

To: Walker, Stuart [Walker.Stuart@epa.gov]; Openchowski, Charles [openchowski.charles@epa.gov]

CC: Brock, Martha [Brock.Martha@epa.gov]

Subject: RE: cheat sheet for Oak Ridge risk based discharge limits

Stuart – For Tc-99 there is a reference to 222.3 pCi/L in one table but 297 in another table as AWQC equivalents – can you explain since they both seem based on CWA default exposure factors. Thanks

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From: Walker, Stuart < Walker. Stuart@epa.gov>

Sent: Monday, October 4, 2021 3:38 PM

To: Openchowski, Charles <openchowski.charles@epa.gov>; Buxbaum, David <Buxbaum.David@epa.gov>

Subject: FW: cheat sheet for Oak Ridge risk based discharge limits

Importance: High

Per our discussion

Stuart Walker

US EPA/OLEM/OSRTI/ARD/SPB

Superfund Remedial Program's National Radiation Expert

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Phone work: 1-202-566-1148 (this will be my number on October 22)

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From: Walker, Stuart

Sent: Wednesday, August 4, 2021 12:21 PM

To: Waterhouse, Carlton < Waterhouse. Carlton@epa.gov>; Breen, Barry < Breen. Barry@epa.gov>

Cc: Goldberg, Ruby <Goldberg, Ruby@epa.gov>; Hilosky, Nick <Hilosky.Nick@epa.gov>

Subject: cheat sheet for Oak Ridge risk based discharge limits

Importance: High

Hello Carlton and Barry,

Per your request from our discussion on July 30, I am attaching a cheat sheet on the Oak Ridge risk assessment regarding discharge limits into Bear Creek. I have broken the cheat sheet into 2 parts:

- 1. **Issues with DOE Discharge Limits in 2021 FS Appendix K** explains how DOE came up with proposed discharge limits in the Focused FS and why their approach is incorrect for complying with the Clean Water Act's Water Quality-Based Effluent Levels (WQBELs) as an ARAR at Bear Creek.
- 2. **Instructions for DOE** provides an explanation on how DOE should develop WBELs and discharge limits for Bear Creek.
 - a. Approach Describes the general procedure DOE should be taking.
 - b. **Methods** Describes the input parameters DOE should be using when running the EPA PRG calculator when developing WBELs.
 - c. **Results** Provides a table of WQBEL and discharge limits I developed using the CWA methodology with the EPA PRG calculator. The table assumes that DOE does not conduct a fish consumption study to support revising the default fish consumption rate with site-specific information.

Please let me know if you have any comments or questions.